

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

TRACBEAM, L.L.C.,

Plaintiff,

v.

AT&T INC.; AT&T MOBILITY L.L.C.;
METROPCS COMMUNICATIONS, INC.;
METROPCS WIRELESS, INC.; TEXAS RSA 7B3,
L.P. d/b/a PEOPLES WIRELESS SERVICES;
SPRINT NEXTEL CORPORATION; SPRINT
SPECTRUM L.P.; NEXTEL OF CALIFORNIA,
INC.; NEXTEL COMMUNICATIONS OF THE
MID-ATLANTIC, INC.; NEXTEL OF NEW
YORK, INC.; NEXTEL SOUTH CORP.; NEXTEL
OF TEXAS, INC.; NEXTEL WEST CORP.;
CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS; GOOGLE, INC.; and SKYHOOK
WIRELESS, INC..

Defendants,

and

LOCATION LABS,

Intervenor.

Case No. 6:11-cv-00096-LED

AGREED MOTION TO STAY DEADLINES

Plaintiff TracBeam, LLC (“TracBeam”) respectfully files this Agreed Motion to Stay Deadlines and would show the Court as follows:

Because of an agreement in principle, the Court granted on December 14, 2011 (D.I. 128), January 17, 2012 (D.I. 136), and on February 17, 2012 (D.I. 153) TracBeam’s Motions to Stay Deadlines for 30 days between TracBeam and Texas RSA 7B3, L.P. d/b/a Peoples WirelessServices (“Peoples Wireless”). Because of continuing efforts to reach a settlement in

principle, TracBeam requests an additional thirty (30) day stay of upcoming deadlines with regard to Peoples Wireless. TracBeam seeks this extension of time not for delay but for good cause and that justice may be served. Peoples Wireless is not opposed to the relief requested in this motion.

WHEREFORE, PREMISES CONSIDERED, TracBeam prays that the Court enter the attached order and stay all pending deadlines between TracBeam and Peoples Wireless for thirty (30) days.

Dated: March 15, 2012

Respectfully submitted,

By: /s/ Elizabeth L. DeRieux

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***ATTORNEYS FOR PLAINTIFF
TRACBEAM, L.L.C.***

CERTIFICATE OF CONFERENCE

In compliance with Local Rule CV-7(h), I hereby certify that counsel for TracBeam conferred with counsel for Texas RSA 7B3, L.P. d/b/a Peoples Wireless Services and this motion is agreed.

/s/ Elizabeth L. DeRieux
Elizabeth L. DeRieux

CERTIFICATE OF SERVICE

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served this March 15, 2012 with a copy of this document via the Court's CM/ECF System per Local Rule CV-5(a)(3). Any other counsel of record will be served by electronic mail, facsimile transmission and/or first class mail on this same date.

/s/ Elizabeth L. DeRieux
Elizabeth L. DeRieux